

**Hearing Date: November 3, 2009  
at 2:00 p.m.**

**Objection Deadline: October 27,  
2009**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**IN RE:**

**Case No. 08-35653-KRH**

**CIRCUIT CITY STORES, INC., et al.,**

**Chapter 11 (Jointly administered)**

**Debtors,**

**SITE A, LLC, A COLORADO  
LIMITED LIABILITY COMPANY,**

**Movant,**

**v.**

**CIRCUIT CITY STORES, INC., et al.,**

**Respondent.**

**NOTICE OF SECOND AMENDED MOTION AND HEARING**

PLEASE TAKE NOTICE THAT Site A, LLC, a Colorado limited liability company, has filed with the Court a Second Amended Motion of Site A, LLC for Payment of Administrative Expense Claim (the "Motion"). A copy of the Motion has been filed with the Court and forwarded to you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps:

Ann K. Crenshaw, Esq. (VSB No. 19538)  
Paul K. Campsen, Esq. (VSB No. 18133)  
Kaufman & Canoles, a professional corporation  
2101 Parks Avenue, Suite 700  
Virginia Beach, VA 23451  
Tele: (757) 491-4000  
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David J. Dansky, Esq.  
Chambers Dansky & Mulvahill, LLC  
1601 Blake Street #500  
Denver, Colorado 80202  
Tele: (303) 825-2222  
Fax: (303) 825-4010

*Counsel for Site A, LLC, a Colorado limited liability company,  
successor in interest to JP Thornton, LLC, a Colorado limited liability company*

1. File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before **October 27, 2009 at 5:00 p.m.**

William C. Redden, Clerk  
United States Bankruptcy Court  
701 E. Broad Street, Suite 4000  
Richmond, VA 23219

You must also deliver a copy to all parties on the Certificate of Service below and to:

Counsel for Circuit City Stores, Inc.  
Douglas M. Foley, Esq.  
McGuireWoods LLP  
9000 World Trade Center  
101 W. Main St.  
Norfolk, VA 23510

Counsel for Official Committee of Unsecured Creditors  
Brad R. Godshall, Esq.  
Pachulski Stang Ziehl & Jones, LLP  
10100 Santa Monica Blvd., 11th Floor  
Los Angeles, CA 90067-4100

Counsel for Official Committee of Unsecured Creditors  
Lynn L. Tavenner, Esquire  
Tavenner & Beran, PLC  
20 North Eighth Street, 2<sup>nd</sup> Floor  
Richmond, VA 23219

Counsel for Site A, LLC, a Colorado limited liability company  
Paul K. Campsen, Esq.  
Ann K. Crenshaw, Esq.  
Kaufman & Canoles  
150 W. Main Street, Suite 2100  
Norfolk, VA 23510

2. Attend the hearing scheduled for **November 3, 2009 at 2:00 p.m.** before the Honorable Kevin R. Huennekens, U.S. Bankruptcy Court, Room 5000, United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: October 15, 2009

**SITE A, LLC, a Colorado  
limited liability company**

By: /s/ Ann K. Crenshaw

Ann K. Crenshaw, Esq. (VSB No. 19538)  
Paul K Campsen, Esq. (VSB No. 18133)  
Kaufman & Canoles, a professional corporation  
2101 Parks Avenue, Suite 700  
Virginia Beach, VA 23451  
Tele: (757) 491-4000

*Counsel for Site A, LLC, a Colorado limited liability company,  
successor in interest to JP Thornton, LLC, a Colorado  
limited liability company*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Notice of Second Amended Motion and Hearing was sent on this 15th day of October, 2009, to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system.

/s/ Ann K. Crenshaw

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